

(date stamped November 6, 1998)

MEMORANDUM

SUBJECT: Treatment Train Interpretation Regarding Newport Chemical Disposal Facility

FROM: Sue Slotnick, Environmental Protection Specialist  
Waste Treatment Branch  
Hazardous Waste Minimization and Management Division

TO: Gary Victorine, Thermal Destruction Expert  
Waste Management Branch (DW-8J)  
Waste, Pesticides, and Toxics Division  
U.S. EPA, Region 5

Thank you for writing to me on October 6, 1998 regarding the U.S. Army's Newport Chemical Disposal Facility located near Newport, Indiana. In your memo, you requested concurrence on Region 5's determination that no treatability variance is needed for the Army's planned process to treat the nerve agent VX at the facility. I have reviewed your memo, as well as the more detailed description you provided previously on the Army's treatment process. From the perspective of the Waste Treatment Branch, there is no need for a treatment variance from the Land Disposal Restrictions (LDRs) for the intermediate material generated during the Army's planned treatment process. The reason is that LDRs apply only when wastes are land disposed, and the Army does not plan to place the intermediate material on the land. Steve Silverman of the U.S. EPA Office of General Counsel has also reviewed the memo and concurs with the Region 5 determination.

As you've stated, the VX is a characteristic reactive waste that also exhibits the Toxicity Characteristic because it exceeds the TC levels for five metal constituents. The Army plans to treat the waste in a treatment train, and to separate the resulting material into liquid and solid fractions. The liquid portion will be treated in a wastewater treatment system subject to the Clean Water Act, and the solids, which may be TC hazardous for the metals, will be treated at a RCRA-permitted facility to meet LDRs prior to disposal. In the neutralization process, an intermediate material referred to as "hydrolysate" is produced, but it is not subject to the LDRs because it is not land disposed. From the information you provided, it is clear that the Army intends to fully comply with the applicable LDRs, and there is no need for a treatment variance. I concur with that overall conclusion, expressed in your October 6 memo, as

well as with the separate points of detail contained there.

If you have further questions, please call me at (703) 308-8462.

cc: Jim Michael, Permits Branch  
Steve Silverman, Office of General Counsel  
Duncan Campbell, Region 5  
Fred Chanania, Waste Treatment Branch